

December 9, 2021

VIA ECF

Hon. Jesse M. Furman  
United States District Judge  
United States District Court for the Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: Bluestone Resources Inc. et al. v. Greensill Capital (UK) Limited et al.,  
Case No. 21-CV-2253 (JMF)**

Dear Judge Furman:

Plaintiffs and Defendants Alexander Greensill and Roland Hartley-Urquhart (the “Individual Defendants”), by and through their undersigned counsel, jointly hereby respectfully request that the stay in this action as to the Individual Defendants entered by order of the Court on September 9, 2021 (Dkt. 43) (the “Stay Order”) be extended for an additional 90 days.

As the Court is aware, pursuant to the Stay Order, all deadlines in this case have been stayed as to the Individual Defendants following the recognition of Defendant Greensill Capital (UK) Limited’s (“GCUK”) administration proceeding under the United Kingdom’s Insolvency Act of 1986 as a foreign main proceeding pursuant to Chapter 15 of the Bankruptcy Code by the U.S. Bankruptcy Court for the Southern District of New York on September 10, 2021, including a stay of the deadline for the Individual Defendants to answer or otherwise respond to the Complaint until December 20, 2021. Because GCUK’s Chapter 15 case remains pending and discussions concerning this action that may affect the scope of this litigation are ongoing, Plaintiffs and the Individual Defendants submit that an extension of the stay as to the Individual Defendants would serve judicial efficiency.

Accordingly, Plaintiffs and the Individual Defendants respectfully request that all deadlines in this case remain stayed as the Individual Defendants for an additional 90 days, including extension of the following deadlines:

	<u>Current Deadline</u>	<u>New Deadline</u>
Individual Defendants to answer or move to dismiss the Amended Complaint:	December 20, 2021	March 21, 2022
Plaintiffs to oppose any motion to dismiss filed by Individual Defendants:	February 18, 2022	May 20, 2022
Individual Defendants to file replies in support of motions to dismiss:	March 11, 2022	June 10, 2022

Plaintiffs and the Individual Defendants also request that the initial pretrial conference remain adjourned *sine die* as provided in the Stay Order.

Respectfully submitted,

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cc: Laura R. Hall (by ECF)